

### **REMARKS**

Reconsideration of the present application is respectfully requested. Independent claim 1 has been amended and now incorporates the limitation previously presented by claim 7. Likewise, independent claim 13 has been amended and now incorporates the limitation previously presented by claim 21. Independent claims 25 and 30 have also been amended, while dependent claims 7 and 21 have been withdrawn. Claims 1 – 6, 8 – 20, 22 – 32 are currently pending.

### **Rejections based on 35 U.S.C. § 103**

Claims 1 – 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Deleeuw, U.S. Patent No. 5,828,900 (“Deleeuw”). Applicants respectfully traverse this rejection. While Applicants continue to believe the previously-presented claims are allowable over the art of record, Applicants have incorporated the limitation of dependent claim 7 into independent claim 1 in an effort advance the prosecution of this application. Likewise, Applicants have incorporated the limitation of dependent claim 21 into independent claim 13. Claim 13 now requires an input manager that is “configured to prevent said one or more applications from handling said input event by providing a sentinel value to the one or more applications” and that is “further configured to reveal said code to said one or more applications in response to a request to disclose said code.” Similar claim language is now found in the other independent claims, claims 1, 25, and 30. Applicants respectfully submit that Deleeuw fails to teach or suggest these aspects of the independent claims.

Deleeuw teaches preventing an application from processing an input event. Office Action, page 8. Because Deleeuw does not teach the claimed use of sentinel values, the Office Action relies on § 103 and states, “A skilled artisan would easily realize that . . . he could

also prevent keyboard events from being interpreted by the application only to make it aware that an input was received and would not process the event.” Office Action, page 8.

As an initial matter, Applicants continue to challenge whether the Office Action establishes a prima facie case of obviousness. As dictated by the MPEP, to establish a prima facie case of obviousness “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” MPEP § 2142 (emphasis added). The Office Action, however, admits that the Deleeuw reference fails to teach sending a sentinel value to the application. Office Action, p. 2. In fact, there is no suggestion by Deleeuw to use a sentinel value for any purpose. While Deleeuw may recognize the same problem addressed by the Applicants, Deleeuw fails to “teach or suggest all the claim limitations” recited in the various independent claims.

In response to Applicant’s “prima facie” arguments, the Office Action cites numerous cases regarding the “test for combining references.” Office Action, page 8 and 9. Applicants, however, respectfully point out that the Office Action has not combined any references with Deleeuw. Rather, the Action relies solely on the teachings of Deleeuw in maintaining the present rejection. Without multiple references to combine, Applicants respectfully submit that the Office Action’s reliance on tests for “combining references” is misplaced. Accordingly, Applicants reiterate their position that the Office Action fails to establish a prima facie case of obviousness as the lone-cited prior art reference, Deleeuw, admittedly does not “teach or suggest all the claim limitations.” MPEP § 2142. Indeed, while Deleeuw addresses a similar problem as the present application, it does not suggest or render obvious the particular solution claimed by the Applicants.

To further demonstrate the differences between Deleeuw and the claimed invention, Applicants have amended the independent claims to include a limitation that was previously presented by dependent claims 7 and 21. For example, claim 1 now requires “notifying an application of said input event by providing said application a sentinel value . . . ; and revealing said code to the application in response to a request to disclose said code.” Nowhere does Deleeuw suggest preventing an application from handling an input event (e.g., “by providing said application a sentinel value”) and then allowing processing of the input event by that particular application (e.g., by “revealing said code to the application in response to a request to disclose said code”), as contemplated by the pending claims.

While Deleeuw addresses preventing an application from handling input events, the only technique for such prevention actually taught by Deleeuw is the disablement of the application. Deleeuw, col. 2, ll. 1 – 34; col. 6, ll. 9 - 12. In handling an input event, Deleeuw expressly requires the disablement of an application to prevent any event handling. Deleeuw, col. 2, ll. 1 – 34; col. 6, ll. 9 - 12. The proposed modification of Deleeuw suggested by the Office Action, however, requires the application be notified of the input event so as to potentially allow processing responsive to the event. In addition, the claims now require that the input code be revealed to the application upon a request for such disclosure. Deleeuw is silent with respect both these claimed aspects. In fact, Deleeuw’s disablement would teach away from either notifying the application of an event or providing a code associated with the event upon a request for such disclosure.

Though the Office Action cites Deleeuw at col. 2, ll. 1 – 22 to teach the claimed revealing of “said code to said one or more applications in response to a request,” this disclosure of Deleeuw is not on point. In contrast to the claim language, the cited portion of Deleeuw

addresses: (1) a system in which “**all** events” are processed by the application (col. 1, l. 67- col. 2, l. 2.); and (2) a system in which the system “will disable or otherwise prevent” the application from handling the input event (col. 2, ll. 15 – 22). Nowhere does this language disclose a request to disclose an input code to an application or the revealing of the code to an application that was previously prevented from handling an input event. Accordingly, Applicants respectfully submit that the cited portion of Deleeuw, along with the rest of its disclosure, fails to teach or suggest “revealing said code to the application in response to a request to disclose said code,” as required by the independent claims. Indeed, Deleeuw’s disablement of the application explicitly teaches away from revealing an input code to a disabled application, and, thus, the claimed subject matter would not be obvious in light of Deleeuw’s teachings.

In sum, Applicants respectfully submit that claims 1 – 6, 8 – 20, 22 – 32 are in condition for allowance. The proposed modification of Deleeuw is inappropriate under the relevant law, and the Office Action fails to establish a prima facie case of obviousness. Specifically, Deleeuw does not teach or suggest “notifying an application of said input event by providing said application a sentinel value . . . ; and revealing said code to the application in response to a request to disclose said code,” as required by independent claims. Thus, Applicants respectfully submit independent claims 1, 13, 25 and 30 are in condition for allowance.

Applicants further submit that dependent claims 2 - 6 and 8 - 12, which depend from claim 1, are in condition for allowance for at least the same reasons discussed above with respect to claim 1. Applicants further submit that dependent claims 14 – 20 and 22 - 24, which depend from claim 13, are in condition for allowance for at least the same reasons discussed above with respect to claim 13. Applicants further submit that dependent claims 26 - 29, which

depend from claim 25, are in condition for allowance for at least the same reasons discussed above with respect to claim 25. Applicants further submit that dependent claims 31 and 32, which depend from claim 30, are in condition for allowance for at least the same reasons discussed above with respect to claim 30.

### **Conclusion**

For the reasons stated above, claims 1 – 6, 8 – 20, 22 – 32 are in condition for allowance. If any issues remain which would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,

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